

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
Debtor.

Bankruptcy Case No. 13-53846

Judge Thomas J. Tucker

Chapter 9

**STIPULATION FOR THE ENTRY OF AN ORDER EXTENDING THE  
DEADLINE FOR THE DPOA TO RESPOND TO THE CITY OF  
DETROIT’S MOTION FOR THE ENTRY OF AN ORDER ENFORCING  
THE PLAN OF ADJUSTMENT INJUNCTION AND REQUIRING THE  
DISMISSAL OF THE DPOA’S MERC ACTION**

The City of Detroit (“City”) and the Detroit Police Officers Association (“DPOA”) stipulate and agree as follows:

A. On December 13, 2016, the City filed the Motion for the Entry of an Order Enforcing the Plan of Adjustment Injunction and Requiring the Dismissal of the DPOA’s MERC Action [Doc. No. 11714] (“Motion”).

B. As set forth more fully in the Motion, the City sought the entry of an order requiring the DPOA to dismiss with prejudice the charge it filed with the Michigan Employment Relations Committee, case number C16 B-014, docket number 16-003635-MERC (“MERC Action”)

C. On December 16, 2016, the DPOA emailed Judge Peltz, who is presiding over the MERC Action, requesting the withdrawal of the charge it filed in the MERC Action.

D. As of the filing of this stipulation, an order dismissing the MERC

Action had not yet been entered in the MERC Action.

E. Consequently, as it appears that this matter will be resolved consensually, the City and the DPOA respectfully request that the Court enter the attached order extending the deadline for the DPOA to respond to the Motion through and including January 9, 2017.

NOW, THEREFORE, the parties stipulate and agree to the entry of the order attached as Exhibit 1, extending the deadline for the DPOA to respond to the Motion through and including January 9, 2017.

STIPULATED AND AGREED:

<b>ATTORNEYS FOR THE CITY</b>  By: <u>/s/ Marc N. Swanson</u> Marc N. Swanson (P71149) MILLER, CANFIELD, PADDOCK AND STONE, P.L.C. 150 West Jefferson, Suite 2500 Detroit, Michigan 48226 Telephone: (313) 963-6420 Facsimile: (313) 496-7500 swansonm@millercanfield.com	<b>ATTORNEYS FOR THE DETROIT POLICE OFFICERS ASSOCIATION</b>  By: <u>/s/ Barbara A. Patek</u> Barbara A. Patek (P34666) Law Office of Barbara A. Patek PLC 27 E. Flint St., Ste. 2 Lake Orion, MI 48362-3220 <a href="mailto:pateklaw@gmail.com">pateklaw@gmail.com</a>
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DATED: December 22, 2016

**EXHIBIT 1**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

In re:

City of Detroit, Michigan,  
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Bankruptcy Case No. 13-53846

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Chapter 9

**ORDER GRANTING STIPULATION FOR THE ENTRY OF AN ORDER  
EXTENDING THE DEADLINE FOR THE DPOA TO RESPOND TO THE  
CITY OF DETROIT'S MOTION FOR THE ENTRY OF AN ORDER  
ENFORCING THE PLAN OF ADJUSTMENT INJUNCTION AND  
REQUIRING THE DISMISSAL OF THE DPOA'S MERC ACTION**

Upon the Stipulation for the Entry of an Order Extending the Deadline for the DPOA to Respond to the City of Detroit's Motion for the Entry of an Order Enforcing the Plan of Adjustment Injunction and Requiring the Dismissal of the DPOA's MERC Action [Doc. # [ ] "Stipulation"); and the Court being otherwise advised in the premises;

IT IS HEREBY ORDERED THAT the deadline for the Detroit Police Officers Association to respond to the City of Detroit's Motion for the Entry of an Order Enforcing the Plan of Adjustment Injunction and Requiring the Dismissal of the DPOA's MERC Action is extended through and including January 9, 2017.